



Policy Title	COVID-19 Vaccination
Policy Number	EH-04
Page	1 of 4

COVID-19 VACCINATION	
<b>POLICY</b>	<p>The purpose of this policy is to reduce the risk of transmission of the SARS-CoV-2 virus that causes the COVID-19 disease and to comply with applicable CMS rules, specifically 42 CFR 482.42(g). The Memorial Healthcare System provides vaccination to all MHS employees, trainees, medical and allied health staff, and volunteers, consistent with the Centers for Disease Control and Prevention Advisory Committee on Immunization Practices recommendations, and in accordance with the Centers for Medicare and Medicaid Services Conditions of Participation. The Employee Health department coordinates and monitors the administration of vaccinations throughout the System.</p>
<b>SCOPE</b>	<p>All Memorial employees; medical staff; students, trainees and volunteers; and individuals under contract or arrangement who provide care, treatment or other services to the healthcare system and/or its patients.</p>
<b>PROCEDURES</b>	<p><b><u>COVID-19 Vaccination Requirement</u></b></p> <p>Pursuant to 42 CFR 482.42(g), all Memorial Healthcare System staff, paid and unpaid, are required to receive at least one dose of the COVID-19 vaccination prior to providing any care, treatment, or other services for the healthcare system and/or its patients. All staff must subsequently receive a full series of vaccination. This requirement applies to all workers (including employed, voluntary, and contracted) in clinical and non-clinical settings with the following exceptions:</p> <ul style="list-style-type: none"> <li>- Remote Workers, as defined by this policy;</li> <li>- Individuals have pending requests for or who have been granted a religious or medical exemption; and</li> <li>- Individuals for whom COVID-19 vaccination must be delayed, as recommended by the CDC, due to clinical precautions and considerations.</li> </ul> <p>Individuals may choose to receive the vaccination by their designated Employee Health department, or may obtain vaccination by a healthcare provider/clinic of their choosing. Those electing to obtain vaccination from their own healthcare provider/clinic must provide Employee Health with documented proof of vaccination, to include the name of the individual vaccinated, the name of the healthcare provider/clinic that administered the vaccination(s), with the date(s) of vaccination, and manufacturer’s name. Individuals may send vaccination cards or records to <a href="mailto:VaxMedEx@mhs.net">VaxMedEx@mhs.net</a>, with “Vaccination Card” in the subject line, ensuring that their employee number (if applicable) is included in the e-mail.</p> <p>After the vaccination series is administered (or proof of vaccination is provided), the Employee Health Nurse Practitioner/designee shall provide a sticker for placement on the individual’s identification badge. This sticker serves as a visual indicator that the individual is not subject to the Enhanced Safety Precautions for Unvaccinated Staff described later in this policy.</p>



Policy Title	COVID-19 Vaccination
Policy Number	EH-04
Page	2 of 4

Booster Doses

Employees may also receive a booster dose from their designated Employee Health department or a healthcare provider of their choosing. Those electing to obtain vaccination from their own healthcare provider/clinic must provide Employee Health with documented proof of vaccination, to include the name of the individual vaccinated, the name of the healthcare provider/clinic that administered the vaccination(s), with the date of vaccination, and manufacturer’s name. Individuals may send vaccination cards or records to [VaxMedEx@mhs.net](mailto:VaxMedEx@mhs.net), with “Vaccination Card” in the subject line, ensuring that their employee number (if applicable) is included in the e-mail.

All vaccination records provided to Employee Health are securely maintained in the employee’s EPIC medical record.

Volunteers should submit proof of primary series vaccination and booster (if applicable) to Employee Health at “VaxMedEx@mhs.net” with “Vaccine Card” in the subject line.

Students should submit proof of primary series vaccination and booster (if applicable) via Complio.

Contracted and Voluntary Medical Staff should submit proof of primary series vaccination and booster (if applicable) to their Medical Staff Office.

Contracted temporary and vendor employees should submit proof of primary series vaccination and booster (if applicable) to their employer and to the Memorial department leader on the unit/department to which they are assigned.

**Exemptions as Medical and Religious Accommodations**

Individuals may request an exemption to this requirement for reasons of medical or religious accommodation. Those approved for an exemption will be required to follow the Enhanced Safety Precautions for Unvaccinated Staff for the duration of the pandemic, or as otherwise directed by the MHS Chief Medical Officer (CMO).

Individuals seeking an exemption for medical reasons must submit a completed COVID-19 Vaccination Medical Exemption Request Form to Employee Health ([VaxMedEx@mhs.net](mailto:VaxMedEx@mhs.net)) and must provide a Medical Certification Form completed, signed and dated by their licensed healthcare provider, which must (1) contain all information specifying which of the authorized COVID-19 vaccines are clinically contraindicated; (2) outline the employee’s specific recognized clinical contraindications to the vaccine or the CDC-recommended reason for delay in receiving the vaccine; and (3) contain a statement by the certifying provider recommending that the individual be exempted from the COVID-19 vaccine requirements based on the recognized clinical contraindications or have vaccination delayed based on CDC recommendations. The certifying healthcare provider may not be the individual requesting the exemption and must be acting within their respective scope of their practice.

Workers seeking an exemption for religious reasons must submit a completed COVID-19 Vaccination Religious Exemption Request Form to Employee Relations ([VaxRegEx@mhs.net](mailto:VaxRegEx@mhs.net)) with “Exemption Request” in the subject line, and must provide supporting documentation.

In certain areas, where patients are especially vulnerable, Memorial may not be able to



Policy Title	COVID-19 Vaccination
Policy Number	EH-04
Page	3 of 4

reasonably accommodate unvaccinated employees.

Employee requests for exemption and supporting documentation are securely maintained in their Employee Health file (medical exemption) or Employee Relations file (religious exemption). Contracted and voluntary medical staff records are securely maintained in their medical staff file.

Non-employees (vendors/contracted workers) seeking exemptions should follow the exemption request process established by their employer, and then provide proof of exemption to the Memorial department leader on the unit/department to which they are assigned. It will be the responsibility of the vendor to ensure compliance with this requirement.

**Enhanced Safety Precautions for Unvaccinated Staff**

For the health and safety of our Memorial caregivers, the following enhanced safety precautions are mandatory for all staff who are not fully vaccinated, including those with approved exemptions:

- Staff who are not fully vaccinated must wear the appropriate designated mask at all times while in a Memorial facility, office, or building. This includes administrative offices and non-clinical areas. In clinical settings, they must wear an N-95 or elastomeric respirator with source control. In non-clinical settings, they must wear a clean and well-fitting mask.
- Staff who are not fully vaccinated may not remove their mask to eat or drink in any public or shared area within a Memorial building. This includes cafeterias, break rooms, lobbies, shared offices, or unenclosed cubicles. They should plan to enjoy their meal or beverage in an outdoor seating area (observing physical distancing) or in a private office with a door.
- Staff who are not fully vaccinated must attend large meetings virtually. Hosts will be sure to include virtual attendance options when scheduling meetings.
- Staff who are not fully vaccinated must view an educational video and sign an attestation within Aspire, Memorial’s learning management system.

Employees who do not comply with the established COVID-19 infection prevention strategies could be subject to disciplinary action, up to and including discharge from employment. This standard applies regardless of vaccination status. The disciplinary action will be determined on a case-by-case basis.

Volunteer assignments for unvaccinated volunteers will be suspended for the duration of the pandemic. Students not in compliance will not be permitted to complete clinical rotations. Non-compliance by other non-employed individuals will be managed pursuant to applicable policies (e.g., vendors, voluntary medical staff, contracted staff).

As circumstances and community transmission rates vary, additional precautions may be instituted. Vaccination does not exempt individuals from compliance with all established safety protocols.



Policy Title	COVID-19 Vaccination
Policy Number	EH-04
Page	4 of 4

	<p><b><u>Auditing and Monitoring of Vaccinations</u></b></p> <ul style="list-style-type: none"> <li>- The Employee Health Department securely stores, tracks and reports employee vaccinations.</li> <li>- The Medical Staff Office securely stores, tracks and reports medical staff vaccinations.</li> <li>- Volunteer Services securely stores, tracks and reports volunteer vaccinations.</li> <li>- Organizational Development/Education securely stores, tracks and reports student vaccinations.</li> <li>- Employee Health reports aggregated vaccination compliance data internally to MHS managers and administrators.</li> <li>- Department leaders are responsible for ensuring compliance by confirming vaccination/exemption for any contracted/temporary/vendor staff assigned to their unit. Exemptions for contracted staff are granted/managed by the vendor employer.</li> <li>- Department leaders are responsible for monitoring compliance with the enhanced safety precautions for those who have not received a full series of vaccination.</li> </ul>
<p><b>DEFINITIONS</b></p>	<p><b>Clinical Setting</b> – for the purposes of this policy, clinical settings are defined as the entire building or office in which patient care or treatment is provided. All rooms and areas within the building are defined as a clinical setting, with the exception of the lobby, cafeteria, and break rooms.</p> <p><b>Fully vaccinated</b> – for the purposes of this policy, fully vaccinated means greater than two weeks has passed since receiving both doses of a multi-dose vaccine, or one dose of a single-dose vaccine.</p> <p><b>Full series of vaccination</b> – for the purposes of this policy, a full series means receiving both doses of the Pfizer or Moderna vaccine, or one dose of the Johnson &amp; Johnson vaccine.</p> <p><b>Non-Clinical Setting</b> – for the purposes of this policy, non-clinical settings are buildings in which no patient care or treatments occur.</p> <p><b>Remote Worker</b> – a worker who performs 100% of their work remotely and who does not enter Memorial facilities or offices at any time and who does not interact in-person with patients, customers, or other staff members in the course of their employment.</p> <p><b>Staff</b> - all MHS employees; medical staff; students, trainees and volunteers; and individuals under contract or arrangement who provide care, treatment or other services to MHS and/or MHS patients.</p>
<p><b>REFERENCES</b></p>	<p>Christie A., Brooks J.T., Hicks L.A., et al. Guidance for implementing COVID-19 prevention strategies in the context of varying community transmission levels and vaccination coverage. MMWR Morbidity Mortality Weekly Report 2021; 70:1044-1047. Retrieved from <a href="https://www.cdc.gov/mmwr/volumes/70/wr/mm7030e2.htm?s_cid=mm7030e2_w">https://www.cdc.gov/mmwr/volumes/70/wr/mm7030e2.htm?s_cid=mm7030e2_w</a></p> <p>Dooling K., Marin M., Wallace M., et al. The Advisory Committee on Immunization Practices' updated interim recommendation for allocation of COVID-19 vaccine — United States, December 2020. MMWR Morbidity Mortality Weekly Report 2021; 69:1657-1660.</p>

## HUMAN RESOURCES POLICY



Policy Title	COVID-19 Vaccination
Policy Number	EH-04
Page	5 of 4

	<p>DOI: <a href="http://dx.doi.org/10.15585/mmwr.mm695152e2">http://dx.doi.org/10.15585/mmwr.mm695152e2</a></p> <p>Medicare and Medicaid Programs; 42 CFR 482.42(g): Condition of participation: Infection prevention and control and antibiotic stewardship programs.</p> <p>Weber, D., Al-Tawfiq, J., Babcock, H., Bryant, K., Drees, M., Elshaboury, R., . . . Young, H. (2021). Multisociety statement on COVID-19 vaccination as a condition of employment for healthcare personnel. <i>Infection Control &amp; Hospital Epidemiology</i>, 1-46. doi:10.1017/ice.2021.322</p>
<b>ORIGINAL ISSUE DATE</b>	August 2021
<b>REVIEW/REVISION DATES</b>	Revised: November 2021, December 2021, January 2022
<b>POLICY OWNER</b>	<p>Human Resources / Employee Health</p> <p>If any of the statements contained in this policy conflict with any verbal statements or agreements made by any representatives of MHS, then the statements contained in this policy shall control the outcome of any such conflict.</p> <p>Memorial reserves the right to modify this policy in whole or in part, at any time, at the discretion of the Healthcare System, or as required by any legislative, regulatory, or accrediting agency.</p> <p>Employees who have questions regarding information contained in this policy should contact Human Resources or the Employee Health Department.</p>